

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MARK REAVES,)	
)	
Plaintiff,)	
)	
v.)	No. 04cv30125-KPN
)	
MASSACHUSETTS ARMY NATIONAL)	
GUARD, et al)	
)	
Defendants.)	

MOTION TO EXTEND TIME

The defendants, Thomas Sellars and Richard Nagle, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, move for a further extension of the deadline to respond to the complaint. The current extension expires on May 27, 2005; the defendants seek an extension through June 27, 2005.

As grounds for this motion, the defendants state that the extension is required in order for them to obtain legal representation. The defendants requested legal representation from the Department of Justice. However, the decision by the Department of Justice has been complicated by the joint state/federal nature of the Massachusetts Army National Guard.¹ Additional time is needed in order for the state and federal justice departments to confer and determine the appropriate legal representation for these defendants.

¹The undersigned is authorized by the Department of Justice to represent the defendants only for the limited purpose of obtaining an extension of time.

In accordance with Local Rule 7.1, the undersigned Assistant U.S. Attorney certifies that she conferred with the pro se plaintiff and he assented to this motion.

WHEREFORE, the defendants respectfully request that the deadline for responding to the complaint be extended to June 27, 2005.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/Karen L. Goodwin
KAREN L. GOODWIN
Assistant U.S. Attorney
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DATED: May 27, 2005

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the persons listed below a copy of the foregoing document by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery:

Mark Reaves
24 Ionia Street
Springfield, MA 01109

James Whitcomb
Assistant Attorney General
1350 Main Street
4th Floor
Springfield, MA 01103

This 27th day of May, 2005

/s/Karen L. Goodwin
KAREN L. GOODWIN

ASSISTANT UNITED STATES ATTORNEY